

# CHADBOURNE & PARKE LLP

Thomas J. Hall

direct tel (212) 408-5487

thall@chadbourne.com

October 11, 2012

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The Hon. Michael A. Hammer  
United States Magistrate Judge  
United States District Court for the District  
of New Jersey  
Martin Luther King, Jr. Federal Building  
and U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

Re: Lisa Perrotta and Michael Perrotta v. LG Electronics, USA, Inc. et al., United States District Court for the District of New Jersey, 12-cv-246-JLL-MAH

Dear Judge Hammer:

We represent LG Electronics, USA, Inc. ("LG") in the above-referenced litigation. We write to the Court on behalf of all of the parties regarding the Court's September 5, 2012 Order setting an initial scheduling conference for November 13, 2012.

LG has filed a motion to dismiss the amended complaint in this action, which, if successful, will dismiss all of the claims set forth in plaintiffs' amended complaint. Briefing on the motion to dismiss is expected to be completed at the end of November, 2012.

In light of LG's pending motion to dismiss, the parties respectfully request that the initial scheduling conference currently scheduled for November 13, 2012 be postponed until after the Court has issued a decision on LG's motion to dismiss.

The parties have conferred and respectfully submit the following proposed discovery schedule:

Rule 26(f) Conference	Within 30 days of the decision on the LG's motion to dismiss, if the amended complaint is allowed to proceed.
Discovery Plan	Within 14 days of the parties' Rule 26(f) Conference.



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Initial Disclosures	Within 14 days of the parties' Rule 26(f) Conference.
Rule 16 Conference	At least 45 days after the ruling on LG's motion to dismiss, in accordance with the dates proposed above.

Thank you for your attention to the parties' request.

Respectfully submitted,

*Thomas J. Hall*

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(RK)

cc: Andrew P. Bell, Esq. - counsel for Plaintiffs  
(by electronic filing)  
Phoebe A. Wilkinson

